

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	
	§	
EAGLE GEOPHYSICAL, INC., <i>et al.</i>,	§	CASE NO. 09-33753-H5-11
	§	
Debtors.	§	(Chapter 11 – Jointly Administered)

**JOINT MOTION TO EXTEND EXCLUSIVE PERIODS
IN WHICH TO FILE AND OBTAIN ACCEPTANCES OF A PLAN**

A HEARING WILL BE CONDUCTED ON THIS MATTER ON JANUARY 13, 2010 AT 2:30 P.M. IN COURTROOM 403, 515 RUSK AVENUE, HOUSTON, TEXAS. IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING SPECIFICALLY ANSWERING EACH PARAGRAPH OF THIS PLEADING. UNLESS OTHERWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE WITH THE CLERK OF THE BANKRUPTCY COURT WITHIN TWENTY-THREE DAYS FROM THE DATE YOU WERE SERVED WITH THIS PLEADING. YOU MUST SERVE A COPY OF YOUR RESPONSE ON THE PERSON WHO SENT YOU THE NOTICE; OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

**To the Honorable Karen K. Brown,
United States Bankruptcy Judge:**

Eagle Geophysical Onshore, Inc. and Eagle Geophysical, Inc. (collectively, the “Debtors”) and the Official Committee of Unsecured Creditors (the “Committee”) file this Joint Motion to Extend Exclusive Periods in which to File and Obtain Acceptances of a Plan.

Nature of the Motion

1. The Debtors and the Committee seek a 30-day extension of the exclusive periods within which the Debtors may file and obtain acceptances of a plan under § 1121(d) of the Bankruptcy Code.

Background

2. On May 31, 2009, the Debtors both filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”). The Debtors continue to manage their properties as debtors in possession pursuant to §§ 1107 and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in these cases.

3. On September 28, 2009, the Court entered an order extending the Debtors’ exclusive period to file a plan to December 28, 2009 and their exclusive period to solicit acceptances of a plan to February 26, 2010.

Relief Requested

4. The Debtors and the Committee request (i) a 30-day extension of their exclusive period to file a plan through January 27, 2010; and (ii) a 30-day extension of the Debtors’ period to obtain acceptances of a plan through March 29, 2010.

5. Pursuant to § 1121(d) of the Bankruptcy Code, the Court may extend the exclusivity for cause. While the Code does not define “cause,” courts have referred to the cause standard set forth in § 1121(d) as a general standard that allows the Bankruptcy Court “maximum flexibility to suit various types of reorganization proceedings.” *In re Gibson & Cushman Dredging Corp.*, 101 B.R. 405, 409 (E.D.N.Y. 1989) (citing *In re Public Serv. Co. of N.H.*, 88 B.R. 521, 534 (Bankr. D. N.H. 1988); *In re Amko Plastics, Inc.*, 197 B.R. 74, 77 (Bankr. S.D. Ohio 1996)).

6. The Debtors and the Committee intend to file and propose a joint plan. The Debtors have circulated a draft plan and disclosure statement to the Committee. The Committee has requested additional time to review and revise the circulated drafts. The Debtors agree that allowing the Committee additional time is appropriate under the circumstances. In light of the

foregoing, the Debtors and the Committee believe that cause exists to grant the requested extensions.

7. Accordingly, the Debtors and the Committee request that the Court (i) grant the Debtors a 30-day extension of their exclusive periods to file a plan through and including January 27, 2010; (ii) grant the Debtors a 30-day extension of the Debtors' period to obtain acceptances of a plan through and including March 29, 2010; and (iii) grant the Debtors and the Committee other just relief.

Dated: December 22, 2009.

Respectfully submitted,

Porter & Hedges, L.L.P.

By: /s/ Joshua W. Wolfshohl
David R. Jones
State Bar No. 00786001/S.D.Tex. No. 16082
Joshua W. Wolfshohl
State Bar No. 24038592
1000 Main, 36th Floor
Houston, Texas 77002
(713) 226-6000
(713) 226-6253 (Facsimile)
Counsel for the Debtors

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument was duly served by United States first class mail to all parties listed on the attached Service List and by electronic transmission to all registered ECF users appearing in the case on December 22, 2008.

/s/ Joshua W. Wolfshohl
Joshua W. Wolfshohl

SERVICE LIST

Eagle Geophysical, Inc.
Eagle Geophysical Onshore, Inc.
c/o H. Malcolm Lovett, Jr.
Strategic Capital Corporation
520 Post Oak Blvd., Suite 320
Houston, TX 77027

Christine March
Office of the United States Trustee
515 Rusk, Suite 3516
Houston, TX 77002

U/S Creditors Committee

Matt Okin
Okin Adams & Kilmer, LLP
1113 Vine St., Suite 201
Houston, TX 77002

Arrow Geophysical Drilling, L.P.
c/o David W. Elrod
500 N. Akard, Suite 3000
Dallas, TX 75201

Mitcham Industries, Inc.
P.O. Box 1175
Huntsville, TX 77342-1175

Mitcham Industries, Inc.
c/o Munsch Hardt Kopf & Harr
500 N. Akard, Suite 3800
Dallas, TX 75201

ARAM Systems Corporation
c/o David Roland
2105 City West Blvd., Suite 400
Houston, TX 77042-2839

Credit Union Services
8131 LBJ Freeway, Suite 400
Dallas, TX 75251

Curry Auto Leasing
14850 Montfort Drive, Suite 295
Dallas, TX 75254

Marquette Equipment Finance
6975 Union Park Center, Suite 200
Midvale, UT 84047

SunTrust Equipment Finance & Leasing
300 East Joppa Road, 7th Floor
Towson, MD 21286

TFG-Texas, L.P.
6925 Union Park Center
Midvale, UT 84047

Town & Country Office Towers, LP
c/o Reliance Property Resource
10565 Katy Freeway, Suite 301
Houston, TX 77024

Wells Fargo Bank
1500 Waugh Drive, 1st Floor
Houston, TX 77019

Eagle Geophysical, Inc.
20 Largest Unsecured Creditors

A. John Knapp, Jr.
1811 Bering Drive, Suite 200
Houston, TX 77057

A. John Knapp, Jr. Trust
1811 Bering Drive, Suite 200
Houston, TX 77057

Allen Schubert
333 East Main, Suite 400
Louisville, KY 40202

Allstate Permit Services, LP
c/o Elrod, PLLC
500 North Akard, Suite 3000
Dallas, TX 75201

American Express
P.O. Box 53800
Phoenix, AZ 85072

Andover Group
919 Milam
Houston, TX 77002

Arrow Geophysical Drilling, L.P.
c/o Elrod, PLLC
500 North Akard, Suite 3000
Dallas, TX 75201

Douglas Thompson
250 Lloyds Lane
Vero Beach, FL 32963

Ronald Wood
Eagle Canada, Inc.
396 11th Avenue SW, Suite 110
Calgary, AB CN T2R 0C5

Eagle Equipment Leasing
300 Jackson Hill
Houston, TX 77007

Eagle Geophysical Offshore
Fixed Income Trust
908 Town & Country Blvd., Suite 400
Houston, TX 77027

Heli-Dunn, Inc.
P.O. Box 276
Phoenix, OR 97535

John Kornitzer
5420 West 61st Place
Mission, KS 66205

Julie Edwards
3826 Coleridge Street
Houston, TX 77005

Kent Teague
1050 Parkdale Drive
McKinney, TX 75069

Paris Residential 1
300 Jackson Hill Street
Houston, TX 77007

Realtime Geophysical Surveys, L.P.
c/o Elrod, PLLC
500 North Akard, Suite 3000
Dallas, TX 75201

Robert Hixon
P.O. Box 1388
Houston, TX 77251

Steward Cable
P.O. Box 11270
Midland, TX 79702

UHY, LLP
12 Greenway Plaza, Suite 1202
Houston, TX 77046

Eagle Geophysical Onshore, Inc.
20 Largest Unsecured Creditors

Allstate Permit Services, LP
c/o Elrod, PLLC
500 North Akard, Suite 3000
Dallas, TX 75201

ARAM Systems, Ltd.
7236 10th Street, NE
Calgary AB CN T2E 8X3

Arrow Geophysical Drilling, L.P.
c/o Elrod, PLLC
500 North Akard, Suite 3000
Dallas, TX 75201

Boone Exploration, Inc.
P.O. Box 8660
Huntsville, TX 77340

Buckley Powder Company
P.O. Box 17532
Denver, CO 80217

Dauterive Contractors, Inc.
4700 E. Old Jeanerette Rd.
New Iberia, LA 70563

Eagle Canada, Inc.
396 11th Avenue SW, Suite 110
Calgary, AB CN T2R 0C5

Energy Operations Nevada
5777 Central Avenue
Boulder, CO 80301

Geophysical Land Services
P.O. Box 1078
Livingston, TX 77351

Geospace Technologies, LP
P.O. Box 3049
Houston, TX 77253

HMS Enterprises, Inc.
9203 Highway 6 S
Suite 124-406
Houston, TX 77083

Mitcham Industries, Inc.
P.O. Box 1175
Huntsville, TX 77342

O'Brien Resources, LLC
P.O. Box 6149
Shreveport, LA 71136-6149

Omni Energy Seismic Services, LLC
2383 Momentum Place
Chicago, IL 60689

Omni Labor Corporation
2385 Momentum Place
Chicago, IL 60689

PM Heli-Ops, Inc.
8371 Gold Ray Road
Central Point, OR 97502

Realtime Geophysical Surveys, L.P.
c/o Elrod, PLLC
500 North Akard, Suite 3000
Dallas, TX 75201

Texas Seismic Rental
12300 Parc Crest Drive
Stafford, TX 77477

Town & Country Office Towers, LP
c/o Reliance Property Resource
10565 Katy Freeway, Suite 301
Houston, TX 77024

Urban Seismic Specialists, Inc.
P. O. Box 1266
New Ulm, TX 78950

Parties Requesting Notice

Geophysical Land Services, LLC
Boone Exploration, Inc.
c/o Charles J. Cain
Cain & Skarnulis, LLP
400 W. 15th Street, Suite 1430
Austin, TX 78701

John P. Dillman
Linebarger Goggan Blair & Sampson
P.O. Box 3064
Houston, TX 77253-3064

David W. Elrod/Worthy Walker
ELROD, PLLC
500 N. Akard Street, Suite 3000
Dallas, TX 75201

Steven A. Leyh
Leyh & Payne, LLP
9545 Katy Freeway, Suite 200
Houston, TX 77024

Randall A. Rios
Munsch Hardt Kopf & Harr, PC
700 Louisiana, 46th Floor
Houston, TX 77002

Yolanda M. Humphrey
Perdue, Brandon, Fielder, Collins & Mott
1235 N. Loop W., Suite 600
Houston, TX 77008

Missouri Dept. of Revenue-Bankruptcy Unit
Attn: Richard M. Maseles
P.O. Box 475
Jefferson City, MO 65105-0475

Theodore M. Haik, Jr.
Haik, Minvielle & Grubbs, LLP
1017 E. Dale Street
P.O. Box 11040
New Iberia, LA 70562-1040

Harold Aubry Dauterive
4700 E. Old Jeanerette Road
New Iberia, LA 70563

David L. Roland
ION Geophysical Corporation
2105 CityWest Blvd, Suite 400
Houston, TX 77042-2839

Robert H. Singleton, Jr.
Singleton Cooksey, LLP
6363 Woodway, Suite 610
Houston, TX 77057

Paul Jordan
Sneed, Vine & Perry
P.O. Box 856
Georgetown, TX 78627

Alvin L. Thomas
Global Geophysical Services, Inc.
13927 S. Gessner Road
Missouri City, TX 77489

Geoffrey B. Treece
Quattlebaum, Grooms, Tull & Burrow
111 Center Street, Suite 1900
Little Rock, AR 72201

Stephen C. Tingey
Ray Quinney & Nebeker, P.C.
36 South State Street, Suite 1400
P.O. Box 45385
Salt Lake City, UT 84145-0385

IKON Office Solutions
Recovery & Bankruptcy Group
3920 Arkwright Road, Suite 400
Macon, GA 31210

Nick Limperos
Grub & Ellis
1330 Post Oak Blvd., Suite 1400
Houston, Texas 77056

Sam Sloan
Third Coast Enterprises
P.O. Box 1416
Hempstead, Texas 77445

Doug H. Edwards
Haynes and Boone, LLP
One Houston Center
1221 McKinney Street, Suite 2100
Houston, TX 77010

Bill Hixon
300 Jackson Hill
P.O. Box 130410
Houston, Texas 77219

Grant DeFehr
Everest Operations Management
14313 N. May, Suite 100
Oklahoma City, OK 73134

Mark Zand
Wexford Capital, LP
411 W. Putnam Ave.
Greenwich CT 06830

Wayne A. Whitener
TGC Industries, Inc.
101 East Park Blvd.
Plano, Texas 75074

Securities Exchange Commission
Attn: Merri Jo Gillette, Regional Director
175 W. Jackson Blvd., Suite 900
Chicago, IL 60604-2908

Department of the Treasury – IRS
1919 Smith Street, Stop 5022HOU
Houston, Texas 77002

Office of the Attorney General
5137 Robert F. Kennedy Bldg.
10th St. & Constitution Ave. NW
Washington, D.C. 20530

Office of the U.S. Attorney
P.O. Box 61129
Houston, Texas 77208

Wanda Cohen
Special Assistant United States Attorney
8701 S. Gessner, Suite 710
Houston, TX 77074

I.R.S.
P.O. Box 21126
Philadelphia, PA 19114

Office of the Attorney General
State of Texas
P.O. Box 12548
Austin, TX 78711-2548

Office of the Attorney General
State of Louisiana
P.O. Box 94005
Baton Rouge, LA 70804

U.S. Department of Labor
Frances Perkins Bldg.
200 Constitution Ave, NW
Washington, D.C. 20210

Canada Revenue Agency
7th Floor
555 MacKenzie Avenue
Ottawa ON K1A 0L5

Ron Moore
Plant & Machinery, Inc.
2901 W. Sam Houston Pkwy N, #A-130
Houston, Texas 77013

Rhett G. Campbell
Mitchell E. Ayer
Thompson & Knight, LLP
333 Clay Street, Suite 3300
Houston, TX 77002

Anthony A. Zmaila
Anthony A. Zmaila Limited PLLC
265 East Warm Springs Rd., Suite 100
Las Vegas, NV 89119